

Application granted. The conference to discuss Defendants' pending motion is adjourned until January 8, 2020 at 3:00 p.m.

SO ORDERED.

Ronnie Abrams, U.S.D.J.  
December 5, 2019



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December 4, 2019

**By ECF**

Honorable Ronnie Abrams  
United States District Court Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, New York 10007

MEMO ENDORSED

Re: *Marc Ameruso v. City of New York, et al.*, 15 Civ. 3381 (RA)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney assigned to the defense in the above-referenced matter. In that capacity, I write to respectfully request an adjournment of the conference currently-scheduled for December 11, 2019 at 3:15 p.m. (Docket Entry No. 122).

As the Court is aware, on July 13, 2017, defendants moved for summary judgment. (Docket Entry No. 98). On December 3, 2019, the Court scheduled a conference to discuss defendants' pending motion. (Docket Entry No. 122). The conference is scheduled for December 11, 2019 at 3:15 p.m. Defendants now seek an adjournment of that conference. The reason for this request is that the undersigned is unavailable at that time, as she will be immersed in trial preparation for a trial scheduled to commence before the Honorable Kiyo A. Matsumoto in Eastern District of New York on December 16, 2019 in *Yaakov Pukhovich v. City of New York, et al.*, 16-cv-1474.<sup>1</sup> Plaintiff's counsel consents to defendants' request for an adjournment of the conference, which is the first of its kind. The parties have conferred and would be available for a conference any time on December 23, 2019.

Thus, defendants respectfully request that the Court adjourn the conference scheduled for December 11, 2019 to any time on December 23, 2019 or any other time convenient for the Court.

Thank you for your consideration herein.

Respectfully submitted,

Brachah Goykadosh  
Senior Counsel  
Special Federal Litigation Division

<sup>1</sup> Jury selection in the *Pukhovich* trial is scheduled for December 9, 2019.